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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

In Re:  
PARRY D MOSS

, Debtor

Case: 23-30413 DM  
Chapter 13  
  
Hearing Date: December 20, 2023  
Time: 10:10 a.m.  
Place: Telephone/Video

OPPOSITION TO CHAPTER 13 TRUSTEE MOTION TO DISMISS CASE

Eric J. Gravel, Attorney for Debtor Parry Moss, hereby OPPOSES the Chapter 13 Trustee

Motion to Dismiss the case herein. This Opposition is based upon the following facts:

1. This case was commenced by the filing of a voluntary petition on behalf of the Debtor on June 27, 2023.
2. The Chapter 13 Trustee filed a Motion to Dismiss Case on 10/24/23 for failure to respond to Trustee's request.
3. Debtor proposes to address the issues raised by the Trustee with the following actions.
4. Debtor will resolve the objection to confirmation of plan by creditor, U.S. Bank National Association, with the filing of an amended plan.
5. The amended plan will list the claim of Sutterfield HOA as a Class 2 claim.
6. The amended plan will select the "none" box in Class 3.

7. Debtor will file an amended Creditor Matrix to ensure that all creditors, including the IRS, receive notice of the Chapter 13 proceedings.
8. The Statement of Financial Affairs will be amended to list the dates of operation of the debtor's business and the income information for the year 2023. The amended Statement of Financial Affairs will include income from pensions and annuities.
9. Debtor will provide a copy of his 2020 Federal Income Tax Return to the Trustee.

Wherefore, the Debtor requests that the Court deny the Chapter 13 Trustee Motion to Dismiss Case.

Respectfully submitted on December 7, 2023.

/s/ Eric J. Gravel

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Eric J. Gravel

## Law Offices of Eric J. Gravel

## PROOF OF SERVICE

I, Wakako Gravel, hereby certify under penalty of perjury that I am over the age of eighteen and a resident of the United States. I further state that on December 7, 2023, I served the attached OPPOSITION TO CHAPTER 13 TRUSTEE MOTION TO DISMISS CASE on the parties listed below. Executed on December 7, 2023.

/s/ Wakako Gravel

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David Burchard  
Trustee in Bankruptcy  
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Via ECF

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